

1 MICHAEL FEUER, City Attorney
2 KATHLEEN A. KENEALY, Chief Assistant City Attorney (SBN 212289)
3 SCOTT MARCUS, Senior Assistant City Attorney (SBN 184980)
4 GABRIEL DERMER, Assistant City Attorney (SBN 229424)
5 FELIX LEBRON, Deputy City Attorney (SBN 232984)
6 **A. PATRICIA URSEA, Deputy City Atty (SBN 221637)**
7 200 N. Main Street, City Hall East, Room 675
8 Los Angeles, CA 90012
9 Telephone (213) 978-7569
10 Facsimile (213) 978-7011
11 Felix.Lebon@lacity.org
12 Patricia.Ursea@lacity.org
13
14 *Attorneys for Defendant, CITY OF LOS ANGELES*

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 JANET GARCIA, GLADYS ZEPEDA,
14 MIRIAM ZAMORA, ALI EL-BEY, PETER
15 DIOCSO JR., MARQUIS ASHLEY, JAMES
16 HAUGABROOK, individuals, KTown FOR
17 ALL, an unincorporated association,
18 ASSOCIATION FOR RESPONSIBLE and
19 EQUITABLE PUBLIC SPENDING an
unincorporated association,

20 *Plaintiffs,*

21 vs.

22 CITY OF LOS ANGELES, a municipal entity;
23 DOES 1-50,

24 *Defendant(s).*

Case No.: 2:19-cv-6182-DSF-PLA
Assigned to Judge Dale S. Fischer

**DEFENDANT CITY OF LOS
ANGELES' EVIDENTIARY
OBJECTIONS TO EVIDENCE
FILED IN SUPPORT OF
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

[City's Opposition; Supporting
Declarations; RJN filed concurrently]

Date: March 30, 2020
Time: 1:30 p.m.
Ctrm: 7D

Defendant City of Los Angeles (“City”) objects to the following evidence filed in support of Plaintiffs’ Motion for Preliminary Injunction (Dkt. No. 38):

Objections to Declaration of Phuong Nguyen (Dkt. No. 38-6):

1. Paragraph 5, page 1, lines 25-26: Statement “*I was present when the organization connected with him again during outreach, and he [Muhammad] told us that he moved because of the sweep.*” Objection that the statement constitutes inadmissible hearsay being offered for the truth of the matter asserted and for which no hearsay exception applies. FRE 801, 802.

2. Paragraph 5, page 2, lines 1-3: Statement “*I have personally been present on multiple occasions where members told us they had moved because of the sweeps.*” Objection that the statement constitutes inadmissible hearsay being offered for the truth of the matter asserted and for which no hearsay exception applies. FRE 801, 802.

Objections to Declaration of Adrian Riskin (Dkt. No. 38-1)

3. Paragraph 6, page 2, lines 1-3, and Exhibit A: Statement “*Attached as Exhibit A to this declaration are true and collection copies of the daily clean-up scheduled from February 12, 2020 through February 24, 2020.*” Objection, Relevance FRE 402, 403.

Dated: March 9, 2020

MICHAEL N. FEUER, City Attorney
KATHLEEN KENEALY, Chief Assistant City Attorney
SCOTT MARCUS, Chief, Civil Litigation Branch
FELIX LEBRON, Deputy City Attorney
A. PATRICIA URSEA, Deputy City Attorney

By: /s/ A. Patricia Ursea

A. PATRICIA URSEA
Deputy City Attorney
Attorneys for Defendant
CITY OF LOS ANGELES